

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Carrie Hudson

Debtor(s)

THE BANK OF NEW YORK MELLON
TRUST COMPANY, N.A. FKA THE
BANK OF NEW YORK TRUST COMPANY,
N.A. AS SUCCESSOR TO
JPMORGAN CHASE BANK, AS TRUSTEE
FOR RESIDENTIAL ASSET
MORTGAGE PRODUCTS, INC. MORTGAGE
ASSET-BACKED
PASS-THROUGH CERTIFICATES SERIES
2006-RP1, or its Successor or Assignee

Movant

vs.

Kenneth E. West, Trustee
Carrie Hudson

Respondent(s)

Chapter 13

Bankruptcy No. 23-12364-pmm

ORDER

Upon consideration of the objection of Creditor to confirmation of the Chapter 13 plan,
and after notice and hearing, it is hereby

ORDERED that the objection is sustained.

BY THE COURT,

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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TRUST COMPANY, N.A. FKA THE BANK
OF NEW YORK TRUST COMPANY, N.A. AS
SUCCESSOR TO JPMORGAN CHASE
BANK, AS TRUSTEE FOR RESIDENTIAL
ASSET MORTGAGE PRODUCTS, INC.
MORTGAGE ASSET-BACKED PASS-
THROUGH CERTIFICATES SERIES 2006-
RP1, or its Successor or Assignee

Movant

vs.

Kenneth E. West, Trustee
Carrie Hudson

Respondent(s)

Chapter 13

Bankruptcy No. 23-12364-pmm

OBJECTION TO PLAN

THE BANK OF NEW YORK MELLON TRUST COMPANY, N.A. FKA THE BANK
OF NEW YORK TRUST COMPANY, N.A. AS SUCCESSOR TO JPMORGAN CHASE
BANK, AS TRUSTEE FOR RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC.
MORTGAGE ASSET-BACKED PASS-THROUGH CERTIFICATES SERIES 2006-RP1
("Creditor") is a secured creditor of the above Debtor and by its counsel hereby objects to the
Debtor's Chapter 13 Plan ("Plan") as follows:

1. Creditor filed a Proof of Claim number 9-1 on October 16, 2023 with respect to
its secured interest in real property of the Debtor or of the estate which is commonly known as
and located at 1506 South Corlies Street, Philadelphia, Pennsylvania 19146 ("Property"); such
Proof of Claim indicates a total debt claim of \$15,836.94.

2. As the loan is being paid in full, Creditor will be de-escrowing the loan.

3. Creditor objects as Debtor's Plan does not state that Debtor will be responsible for
the payment of real estate taxes and homeowners' insurance going forward.

WHEREFORE, for the foregoing reasons, THE BANK OF NEW YORK MELLON TRUST COMPANY, N.A. FKA THE BANK OF NEW YORK TRUST COMPANY, N.A. AS SUCCESSOR TO JPMORGAN CHASE BANK, AS TRUSTEE FOR RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC. MORTGAGE ASSET-BACKED PASS-THROUGH CERTIFICATES SERIES 2006-RP1 requests that Debtor's plan be amended to reflect Debtor's payment of real estate taxes and homeowners' insurance going forward.

/s/ Andrew M. Lubin

ANDREW M. LUBIN, ESQUIRE ID # 54297

Attorney for THE BANK OF NEW YORK MELLON TRUST COMPANY, N.A. FKA THE BANK OF NEW YORK TRUST COMPANY, N.A. AS SUCCESSOR TO JPMORGAN CHASE BANK, AS TRUSTEE FOR RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC. MORTGAGE ASSET BACKED PASS-THROUGH CERTIFICATES SERIES 2006-RP1

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COMPANY, N.A. FKA THE BANK OF NEW YORK
TRUST COMPANY, N.A. AS SUCCESSOR TO
JPMORGAN CHASE BANK, AS TRUSTEE FOR
RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC.
MORTGAGE ASSET-BACKED PASS-THROUGH
CERTIFICATES SERIES 2006-RP1, or its Successor or
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Chapter 13
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CERTIFICATION OF SERVICE OF OBJECTION TO PLAN

I, Andrew M. Lubin, attorney for THE BANK OF NEW YORK MELLON TRUST COMPANY, N.A. FKA THE BANK OF NEW YORK TRUST COMPANY, N.A. AS SUCCESSOR TO JPMORGAN CHASE BANK, AS TRUSTEE FOR RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC. MORTGAGE ASSET-BACKED PASS-THROUGH CERTIFICATES SERIES 2006-RP1, hereby certify that I served a true and correct copy of the foregoing Objection to Plan, by United States Mail, first class, postage prepaid, and/or electronic means, upon the following:

Date Served: March 16, 2024

Carrie Hudson
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Philadelphia, PA19146

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Philadelphia, PA 19102
Attorney for Debtor

Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA19107
Trustee

United States Trustee
Office of United States Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA19107

/s/ Andrew M. Lubin

ANDREW M. LUBIN, ESQUIRE ID # 54297

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